

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

UNITED STATES OF AMERICA

v.

KYUNG MIN KONG (01)

BON JUN KOO (02)

MOO KYUM LEE (03)

No. **2 - 18 C R - 030 - D**

INDICTMENT

The Grand Jury Charges:

Count One

Possession of Fifteen or More Counterfeit Access Devices  
(Violation of 18 U.S.C. § 1029(a)(3))

On or about March 20, 2018, in the Amarillo division of the Northern District of Texas, and elsewhere, **Kyung Min Kong, Bon Jun Koo, and Moo Kyum Lee**, defendants, knowingly and with intent to defraud, possessed at least fifteen and more counterfeit access devices, to wit: gift cards and debit cards, said possession affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 1029(a)(3) and Title 18, United States Code, Section 2.

Forfeiture Notice

(18 U.S.C. §§ 982(a)(2)(B) and 1029(c)(1)(C))

1. Upon conviction of the offense alleged in Count One of the indictment, **Kyung Min Kong, Bon Jun Koo, and Moo Kyum Lee**, defendants, shall forfeit to the United States of America:

(A) pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation.

(B) pursuant to Title 18, United States Code, Section 1029(c)(1)(C), any personal property used or intended to be used to commit the offense.

2. If any of the property described above, as a result of any act or omission of the defendant:

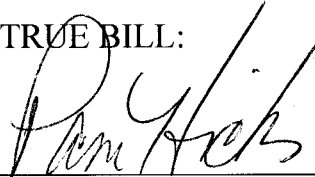
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States

Code, Sections 982(b)(1) and 1029(c)(2) and Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. §§ 982(a)(2)(B) and 1029(c)(1)(C) and 28 U.S.C. § 2461(c).

A TRUE BILL:



FOREPERSON

ERIN NEALY COX  
UNITED STATES ATTORNEY



ANNA MARIE BELL  
Assistant United States Attorney  
New Mexico Bar No. 12501  
500 South Taylor Street, Suite 300  
Amarillo, Texas 79101-2446  
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NORTHERN DISTRICT OF TEXAS  
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THE UNITED STATES OF AMERICA

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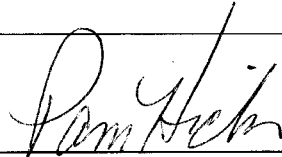
INDICTMENT

Possession of Fifteen or More Counterfeit Access Devices  
18 U.S.C. § 1029(a)(3)

FORFEITURE NOTICE  
(1 COUNT)

A true bill rendered:

Amarillo



FOREPERSON

Filed in open court this 29<sup>th</sup> day of March, A.D. 2018.

Clerk

DEFENDANTS IN FEDERAL CUSTODY  
(Complaint filed 3/21/18 - 2:18-MJ-32)

  
UNITED STATES MAGISTRATE JUDGE